

DECLARATION OF TRAVIS JOHN COLLINS, ATTORNEY FOR S.M.R.

I, Travis John Collins, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am an immigration attorney in Arlington, Virginia. My practice focuses on removal defense. I represent S.M.R. in his immigration proceedings.
2. S.M.R. is currently detained at the Immigration and Customs Enforcement (“ICE”) Bluebonnet Detention Facility in Anson, TX, which is owned by Jones County, TX, and operated by MTC.
3. S.M.R. is a citizen of Venezuela who was born in 1992. He entered the United States in August 2023 and filed a timely asylum application.
6. On March 14, 2025, S.M.R. was detained by immigration agents, along with other relatives. After S.M.R. was detained, he was initially transferred to Farmville Detention Facility in Virginia. S.M.R. was made to wear green clothing, which signified that he was a member of Tren de Aragua. He also was labelled as Tren de Aragua in his tablet.
9. On April 11, S.M.R. was told by staff at the detention facility that he needed to add a medical checkup. Once S.M.R. arrived to the checkup, he was met by agents who began interrogating him about his ties to Tren de Aragua and pressured him to admit that he was a member of Tren de Aragua. S.M.R. practices Santeria and has a tattoo of a crown, a meaningful symbol in Santeria. He also has a tattoo of a soccer ball. He also has a tattoo of a shoeblack plant (“cayena”), which he obtained with his girlfriend.
10. On the night of April 13, S.M.R. was transferred from Virginia. I was scheduled to have a video call with S.M.R. on April 14; that same morning, I received an email notifying me that the video call had been cancelled. After checking ICE Detainee Locator, I contacted the detention center and emailed ERO as an attempt to obtain his location.
11. Sometime between April 14-16, S.M.R. was transferred to Bluebonnet Detention Facility. On the night of April 16, I was made aware of his location and emailed a request for a video call. I received a follow-up to my request on April 18.
12. The morning of April 18, S.M.R. was called and told that ICE agents wanted to speak to him. He was given papers telling him that he was going to be removed. They were interrogating him about being part of Tren de Aragua. He was shown a paper that said 50 U.S.C. 21 with a red stamp. They were asking him to sign documents which he refused to sign. He was taken away to another area.

_____/s/ Travis John Collins_____

Executed this 18th day of April, 2025